

**COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Energy**

**RESPONSE OF THE ATTORNEY GENERAL TO THE
SECOND SET OF INFORMATION REQUESTS FROM THE
BAY STATE GAS COMPANY
DTE 05-27**

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-24 Refer to the Cavallo Testimony at 8, line 23. Describe in detail why Mr. Cavallo believes that RJ Rudden engaged Heath Associates, and why Mr. Cavallo believes Heath Associates is a “leak detection company.”

Response: The report by Rudden Associates notes that “Heath Consultants were retained to provide operating and engineering advice on the project.” AG- 2 -16 (b), p. 3 , note 4. *See* the Heath website, www.heathus.com, for a full description of all the services Heath provides, which includes the statements: “Heath Consultants Incorporated was founded in 1933, with an initial focus on leak detection for the natural gas industry”, and “Gas leak investigation and inspections, underground utility damage prevention, water accountability and training are among the specialties which make Heath Consultants an expert in utility services.”

Mr. Cavallo’s testimony inadvertently referred to Heath Consultants as “Heath Associates.” Mr. Cavallo corrected his testimony on the record.

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